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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 20-CR-00249 RS
)	
Plaintiff,)	
)	STIPULATION AND [PROPOSED] ORDER
v.)	CONTINUING STATUS CONFERENCE
)	
ROWLAND MARCUS ANDRADE,)	
)	
Defendant.)	

This matter is currently set for a status conference on May 11, 2021, at 2:30pm. Since the parties' last report to the Court, the government has continued producing a large volume of discovery. The most recent production, including voluminous search warrant returns, was produced via physical media on May 5, 2021. The defense team is currently reviewing those materials. The government is currently processing and preparing its next production of documents.

The discovery in the case is voluminous, and the parties request an approximate 60-day continuance in order to provide the defense with the opportunity to continue to review these discovery materials, and for the government to continue producing documents. The parties will also take these sixty days to explore whether this matter can be resolved via an agreement. The parties also request that

the Court exclude time from the Speedy Trial Act deadlines on the basis that the proposed continuance will allow for the effective preparation of counsel. The parties agree that the ends of justice served by this continuance outweigh the best interest of the public and the defendant in a speedy trial. The parties further agree that the failure to grant this continuance would unreasonably deny counsel for defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. Accordingly, the parties agree that the period from May 11, 2021 through July 13, 2021, or the date of the continued Status Conference, should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel, taking into account the exercise of due diligence.

IT IS SO STIPULATED.

DATED: May 7, 2021

Respectfully submitted,

STEPHANIE M. HINDS
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/s/
ANDREW F. DAWSON
Assistant United States Attorney

ZUBER LAWLER & DEL DUCA LLP

/s/
BRIAN J. BECK
Attorney for Defendant

[PROPOSED] ORDER

For the reasons stated in the stipulation of the parties above, and for good cause shown, the Court hereby orders that the Status Conference currently set for May 11, 2021 is vacated and reset for July 13, 2021, at 2:30 p.m. It is further ordered that time is excluded, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv) through July 13, 2021.

DATED:

HONORABLE RICHARD SEEBORG
United States District Judge